Waste Information Needs (WIN) Initiative Biennial Report, Part A, and Notification Forms Changes

WIN Background

- In response to the concerns raised over the years about a lack of a comprehensive strategy in the way EPA's Office of Solid Waste (OSW) collects hazardous waste information, the WIN Initiative was created by the states and OSW to develop and implement a solution.

- The objective of WIN is to assess the information needs of the hazardous waste program, assess the way information is managed by the hazardous waste program, and make recommendations for improvement.

- WIN also has been tasked with making the changes that will improve the collection, quality, use, and management of hazardous waste information, and make that information more easily available to states, EPA, Tribes, and the public.

Federal Register Notice

$ OSW published a Federal Register notice February 12, 2001 with a set of recommendations from WIN.

$ These recommendations affect the Biennial Report, the Notification of Regulated Waste Activity (Notification), and the RCRA Part A Permit Application (Part A).

$ The changes to the Biennial Report will be implemented (with one exception discussed below) in 2001. The changes in the Notification and Part A forms will be implemented the next time their ICRs are renewed (in early 2002).

Federal Register Notice Recommendations

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Create a New RCRA Site Identification Form

- Basic site information is collected from all RCRA-regulated facilities on the Notification form. Generators and Treatment, Storage, and Disposal Facilities (TSDFs) report site information on the Biennial Report Identification and Certification (IC) form. Facilities that treat, store or dispose of hazardous waste submit site information on the RCRA Part A form.
- The new RCRA Site Identification form will replace both the Notification and the Biennial Report IC forms. The Part A form additions will be modified to request only process information.
- The new RCRA Site Identification form will be submitted whenever a Notification or a Biennial Report IC form would otherwise be required. And, it will be submitted along with the modified Part A form.

Obtain for the EPA National Database Information on Generators, as Defined by Both RCRA and State Definitions

$ States need to know the regulatory status of a generator as defined by their state's rules.

$ States will report to EPA their generator universe as defined by their state rules. They will also, to the best of their abilities, report to EPA their generator universe as defined by RCRA.

$ Including the state-defined generators in the RCRA national database will provide a more complete picture of the number of waste generators in the country.

Tracking Hazardous Waste Exports

$ Generators exporting hazardous waste must submit an annual report of its exported waste. The Agency maintains a database for this information, the Hazardous Waste Export Data System.

$ We plan to integrate data in the Hazardous Waste Export Data System into the national RCRA information system. This will eliminate the need to collect export data through the Biennial Report.

Tracking Hazardous Waste Imports

$ We have added the activity of importing hazardous waste to the new RCRA Site Identification form.

$ We also clarify in the Biennial Report instructions that importers of hazardous waste must note on the Biennial Report that the waste was imported.

$ Importers of hazardous waste are the "Generator of Record" and must report the waste as being imported by using Source Code G62.

Clarify Types of Hazardous Wastes to be Reported on the Biennial Report (i.e., the Exempt Waste Issue)

- $ RCRA regulations exempt specific hazardous wastes and distinct hazardous waste management processes from Biennial Reporting. When these exemptions were crafted, the issue of whether the affected wastes should continue to be reported under the Biennial Report was not addressed.
- $ EPA has provided guidance on the issue, but there as been confusion among generators over which wastes to report.

- We have changed the Biennial Report instructions to clarify that generators should report only the hazardous wastes which count toward the determination of their generator status for the most part.
- This change generally exempts waste waters managed immediately on-site in management systems governed by NPDES regulations from RCRA Biennial Reporting requirements.

Streamline Biennial Report Source, Origin, Form, and Management Codes

$ A review of the information needs identified by WIN suggests that the existing Biennial Report Source, Origin, Form and Management codes could be streamlined to improve the usefulness of the information we receive. We plan to:

- - Consolidate, regroup, and merge current Source codes with the current Origin codes.
- - Revise Form codes so that there would be 47 codes instead of 89.
- - Eliminate overlap between Management Method and Form codes.

2001 Hazardous Waste Report code lists with enhanced descriptions.

For all code lists it is most important to chose codes by looking first at the category and second at the actual code description. The codes are hierarchical with the importance of the code characters decreasing in importance form left to right.

Table 1. Source Codes

Code	Source of Generation	Old Code(s)
	Wastes directly from ongoing production and service processes -on-going waste from general day to day manufacturing or maintenance activities.	
G01	Dip, flush or spray rinsing (using solvents to clean or prepare parts or assemblies for further processing - i.e. painting or assembly)	A04, A05, A06, A31
G02	Stripping and acid or caustic cleaning (using caustics to remove coatings or layers from parts or assemblies)	A01, A02, A03
G03	Plating and phosphating (electro- or non-electroplating or phosphating)	A22, A23, A24
G04	Etching(using caustics or other methods to remove layers or partial layers)	A27
G05	Metal forming and treatment (pickling, heat treating, punching, bending, annealing, grinding, hardening, etc.)	A25, A26,A40
G06	Painting and coating (manufacturing, building, or maintenance)	A21, A29
G07	Product and by-product processing (direct flow of wastes from Chemical manufacturing or processing, etc.)	A32,A35, A41, A4
G08	Removal of spent process liquids or catalysts(bulk removal of wastes from Chemical manufacturing or processing, etc.)	A36, A37
G09	Other production or service-related processes(where the waste is a direct outflow or result - specify in comments)	A49, A29, A07, A08, A19

New →

	Other Intermittent events or processes	
G11	Discarding off-specification or out-of-date chemicals or products (Unused product - corresponds to U and P listed wastes)	A57, A58
G12	Lagoon or sediment dragout and residuals collection (large scale operations in open pits or ponds)	NEW
G13	Cleaning out process equipment (periodic sludge or residual removal from enclosed processes including internal scrubbing or cleaning)	A09
G14	Removal of tank sludge, sediments or slag(periodic sludge or residual removal from storage tanks including internal scrubbing or cleaning)	A38, A39, A60
G15	Process equipment change-out or discontinue use of equipment (final materials and residuals removal including cleaning)	A56
G16	Oil changes and filter or battery replacement (automotive, etc)	A54, A55
G19	Other one-time or intermittent processes(specify in comments)	A59, A60, A91
	Pollution control and waste management process residuals	
G21	Air pollution control devices (baghouse dust, etc from stack scrubbers, vapor collection, precipitation, etc.)	A78
G22	Laboratory analytical wastes (used chemicals from laboratory operations)	A94
G23	Wastewater treatment (sludge, filter cake, etc including wastes from treatment before POTW, NPDES or UIC disposal)	A75
G24	Solvent or product distillation or recovery (sludge, waste solvent, bottoms, from recovery/recycling of used product)	A33, A34, A73
G25	Hazardous waste management - indicate management method (residuals from regulated HW treatment processes - show the H code)	A71-A74, A76, A77, A89
G26	Leachate collection.(From landfill operations)	A79
	Spills and accidental releases	
G31	Accidental contamination of products, materials or containers (indicates questionable management practices)	NEW
G32	Cleanup of spill residues(indicates questionable management	A53
G33	Leak collection and floor sweeping (generally on-going)	A51, A92
G39	Other cleanup of current contamination(specify in comments)	NEW

	Remediation of past contamination	
G41	Closure of hazardous waste management unit under RCRA	A64
G42	Corrective action at a solid waste management unit under RCRA	A63
G43	Remedial action or emergency response under Superfund	A61, A62
G44	State-program or voluntary cleanup	A93, NEW
G45	Underground storage tank cleanup	A65
G49	Other remediation(specify in comments)	A69
	Waste not physically generated on-site	
G61	Hazardous waste received from off-site for storage/bulking and transfer off-site for treatment or disposal. (to match H141 received waste from form(s) WR)	A89,NEW (Origin = 4)
G62	Hazardous waste received from a foreign country,(not a foreign DOD site, Malquiladora, US territory or protectorate) This site was the generator of record. (This site is a designated waste importer ID)	NEW

New

Table 2: Management Method Codes (Ultimate management method at this site)

Code	Waste handling method	Old Code(s)
	Reclamation and recovery	
H010	Metals recovery including retorting, smelting, chemical, etc.	M011-M019
H020	Solvents recovery (distillation, extraction, etc)	M021-M029, M104
H039	Other recovery or reclamation for reuse including acid regeneration, organics recovery, etc.(specify in comments)	M031-M039
H050	Energy recovery at this site - use as fuel (includes on-site fuel blending before energy recovery - report both as one H050 method)	M051-M059
H061	Fuel blending prior to energy recovery at another site. (generated at this site or received from off site)	M061

	Destruction or Treatment prior to disposal at another site	
H040	Incineration - thermal destruction other than use as a fuel (includes any preparation prior to burning)	M041-49
H071	Chemical reduction with or without precipitation (includes any preparation or final processes for consolidation of residuals)	M071
H073	Cyanide destruction with or without precipitation(includes any preparation or final processes for consolidation of residuals)	M073
H075	Chemical oxidation (includes any preparation or final processes for consolidation of residuals)	M075
H076	Wet air oxidation(includes any preparation or final processes for consolidation of residuals)	M076, M084, M093
H077	Other chemical precipitation with or without pre-treatment (includes processes for consolidation of residuals)	M072, M074, M077
H081	Biological treatment with or without precipitation(includes any preparation or final processes for consolidation of residuals)	M081, M091
H082	Adsorption (as the major component of treatment)	M082, M092, M103
H083	Air or steam stripping (as the major component of treatment)	M083
H101	Sludge treatment and/or dewatering (as the major component of treatment - not H071-H083)	M101, M102, M109
H103	Absorption (as the major component of treatment)	M103
H111	Stabilization or chemical fixation prior to disposal at another site. (as the major component of treatment - not H071-H083)	M111
H112	Macro-encapsulation prior to disposal at another site. (as the major component of treatment - not H071-H083)	M112, NEW
H121	Neutralization only (no other treatment)	M121
H122	Evaporation(as the major component of treatment - not H071-H083)	M122
H123	Settling or clarification(as the major component of treatment - not H071-H083)	M123
H124	Phase separation(as the major component of treatment - not H071-H083)	M124
H129	Other treatment (specify in comments - not H071-H124)	M078, M079, M085, M089, M094, M089, M099, M119, M125, M129
	Disposal	
H131	Land treatment or application (to include any on-site or off-site treatment and/or stabilization prior to disposal on-site)	M131
H132	Landfill or surface impoundment that will be closed as a landfill (to include on-site or off-site treatment and/or stabilization)	M132, M133
H134	Deepwell or underground injection (with or without treatment - this waste is counted as a hazardous waste)	M134
H135	Discharge to sewer/POTW or NPDES (with prior storage regulated by RCRA - not necessarily permit required - with or without treatment)	M135, M136

New →

Table 3: Form Codes

Code	Form Group	Old Code
	Mixed Media/ Debris / Devices - Waste that is a mixture of organic and inorganic or liquid and solid wastes or devices are not easily categorizable.	
W001	Lab packs with no acute hazardous waste (from any source)	B001, B003,B009
W002	Contaminated debris: paper, clothing, rags, wood, empty fiber or plastic containers, glass, piping, other solids (usually from construction, remediation, demolition, or cleaning)	B002,B406, NEW
W004	Lab packs containing acute hazardous waste (from any source)	B004
W301	Contaminated soil (usually from remediation, demolition, or cleaning)	B301,B302,
W309	Batteries, battery parts, cores, casings (lead-acid or otherwise)	B309
W310	Filters, solid adsorbents, ion exchange resins and spent carbon (usually from remediation, production, or intermittent processes)	B310,B404
W320	Electrical devices (lamps, thermostats, CRTs, fluorescents, etc usually Mercury or lead containing)	NEW
W512	Sediment or lagoon dragout, drilling or other muds (i.e. wet and muddy W301 soils)	B512,B513, B514
W801	Compressed gases (any type)	B701,B801
	Inorganic liquids - Waste that is primarily inorganic and highly fluid (e.g., aqueous), with low suspended inorganic solids and low organic content	
W101	Very dilute aqueous waste containing more than 99% water (Land Ban defined wastewater, not exempted via NPDES/POTW)	B101,B102, B114,B116
W103	Spent concentrated acid (5% or more acid)	B103,B104
W105	Acidic aqueous wastes less than 5% acid (diluted but pH <2)	B105
W107	Aqueous waste containing cyanides (generally Caustic)	B107,B108
W110	Caustic aqueous waste without cyanides(pH >12.5)	B106,B109, B110
W113	Other aqueous waste or wastewaters (fluid, not sludgy)	B111,B112, B113,B115
W117	Waste liquid mercury (metallic)	B117
W119	Other inorganic liquid (specify in comments)	B119

Organic liquids - Waste that is primarily organic and is highly fluid, with low inorganic solids content and low-to-moderate water content		
W200	Still bottoms in liquid form.(fluid, not sludgy)	B601,B602, NEW
W202	Concentrated halogenated (i.e. chlorinated) solvent	B202
W203	Concentrated non-halogenated (i.e. chlorinated) solvent	B203
W204	Concentrated halogenated/ non-halogenated solvent mixture	B204,B201
W205	Oil-water emulsion or mixture (fluid, not sludgy)	B205
W206	Waste oil	B206
W209	Paint, ink, lacquer, or varnish (fluid, not dry or sludgy)	B209
W210	Reactive or polymerizable organic liquids and adhesives(fluid, not sludgy)	B210,B212
W211	Paint thinner or petroleum distillates	B211
W219	Other organic liquid (specify in comments)	B207,B208, B219
Inorganic solids - Waste that is primarily inorganic and solid, with low organic content and low-to-moderate water content; not pumpable		
W303	Ash (from combustion of any type)	B303
W304	Slags, drosses, and other solid thermal residues	B303,B304
W307	Metal scale, filings and scrap (including metal drums)	B307,B308
W312	Cyanide or metal cyanide bearing solids, salts or chemicals	B312,B313
W316	Metal salts or chemicals not containing cyanides	B316,
W319	Other inorganic solids (specify in comments)	B311,B319, B314, B315
Organic solids - Waste that is primarily organic and solid, with low-to-moderate inorganic content and water content; not pumpable		
W401	Pesticide solids (used or discarded - not W301 contaminated soils)	B401,B402
W403	Solid resins, plastics or polymerized organics	B403
W405	Explosives or reactive organic solids	B405
W409	Other organic solids (specify in comments)	B407,B409
Inorganic Sludges - Waste that is primarily inorganic, with moderate-to-high water content and low organic content; mostly pumpable		
W501	Lime and/or metal hydroxide sludges and solids with no cyanides (not W512 contaminated muds)	B501,B502, B305,B306
W503	Gypsum sludges (from wastewater treatment or air pollution control)	B503
W504	Other sludges (from wastewater treatment or air pollution control).	B504,B511
W505	Metal bearing sludges (including plating sludge) not containing cyanides	B505,B510
W506	Cyanide-bearing sludges (not W512 contaminated muds)	B506,B507
W519	Other inorganic sludges (specify in comments - not W512 contaminated muds)	B508,B509, B515,B516, B519,B607
Organic Sludges - Waste that is primarily organic with low-to-moderate inorganic solids content and water content; pumpable		
W603	Oily sludge (not W512 contaminated muds)	B603
W604	Paint or ink sludges, still bottoms in sludge form. (not W512 contaminated	B601,B602,

Removal of Data Elements from the Biennial Report

- From the WIN analysis, a number of Biennial Report data elements were identified for elimination: Point of Measurement, Standard Industrial Classification (SIC) Code, and Off-site availability.

- RCRA Radioactive Mixed Waste. The Biennial Report asks whether the waste being reported is a RCRA Radioactive Mixed Waste. WIN learned that some existing compliance agreements with federal facilities require this data element for compliance monitoring, so it will continue to be collected for the 2001 Biennial Report cycle.
- At this time, we are planning to remove it starting with the 2003 Biennial Report, as long as the compliance agreement information needs are able to be satisfied by another source of information.

Make the Source Code on the Biennial Report Mandatory

$ Previously, the Source Code was a non-mandatory data element on the Biennial Report. For 2001 and the future, the Source Code will be a mandatory data element.

$See http://www.epa.gov/epaoswer/hazwaste/data/brs01/forms.htm for details